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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROBERT JACKSON

Plaintiff,

v.

STATE OF NEVADA, et al.,

Defendant(s).

Case No.: 2:16-CV-00995-APG-NJK

**STIPULATION TO EXTEND
DEADLINES IN STATUS REPORT
(ECF NO. 135)**

Plaintiff Robert Jackson ("Mr. Jackson"), by and through his undersigned counsel, and Defendants State of Nevada, et al., ("Defendants"), by and through their undersigned counsel, hereby stipulate and agree to extend the time to confer in an attempt to resolve the outstanding issues of fees and costs, as set forth in the Status Report filed February 27, 2023. (ECF No. 135.)

The parties have been negotiating regarding the attorneys' fee and cost award in good faith, but have been unable to reach an agreement. The parties believe that additional time may assist the parties in reaching an agreement without the assistance of the Court.

Accordingly, on or before June 12, 2023, if the parties cannot reach an agreement regarding the outstanding issues of fees and costs, Plaintiff shall file a motion for fees and costs. In addition, Defendants reserve the right to file their own motion for fees and costs and to file an appropriate opposition to any motion Plaintiff may file. Alternatively, if the parties are able to reach an agreement, on or before June 12, 2023, the parties shall submit a proposed form of final judgment.

1 This is the first stipulation for an extension of time to confer regarding the outstanding
2 issues of fees and costs. The Parties represent that this stipulation is sought in good faith, is not
3 interposed for delay, and is not filed for an improper purpose. Accordingly, the deadline set forth
4 in the Status Report shall be extended as follows:

5 Deadline for the parties to file a proposed form of final judgment or status report or for
6 Plaintiff to file a motion for attorneys' fees and costs: June 12, 2023.

7 DATED this 27th day of April 2023

DATED this 27th day of April 2023

8 By: /s/ Emily A. Buchwald
9 Emily A. Buchwald, Esq., Bar No. 13442
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By: /s/ D. Randall Gilmer
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Las Vegas, Nevada 89101

11 *Attorneys for Defendant Robert Jackson*

12 *Attorney for Defendants Jennifer Nash and*
13 *Brian Williams*

14
15 **IT IS SO ORDERED.**

16 
17 UNITED STATES DISTRICT JUDGE

18 DATED: May 1, 2023

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